

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

BRENDA STRAIT, as Personal
Representative of the Estate of Danny
Whitney, Deceased,

Plaintiff,

v.

Case No. 14-cv-00630
Hon. Paul L. Maloney

COUNTY OF GRAND TRAVERSE,
SHERIFF THOMAS BENSLEY,
DEPUTY SCOTT MARTIN,
SERGEANT ED LASSA, CORRECTIONAL
HEALTHCARE COMPANIES, INC.,
HEALTH PROFESSIONALS, LTD, P.C.,
STEPHANIE L. MILLER, LPN, and
WILFRED P. SALDANHA, MD,
Jointly and Severally,

Defendants.

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**REPLY TO DEFENDANTS, CORRECTIONAL HEALTHCARE COMPANIES, INC.,
HEALTH PROFESSIONALS, LTD, P.C., STEPHANIE L. MILLER, LPN AND
WILFRED P. SALDANHA, M.D'S AFFIRMATIVE DEFENSES**

Plaintiff, BRENDA STRAIT, as Personal Representative for the Estate of Danny Whitney, deceased, by and through their attorneys, JOHNSON LAW, PLC, for their responses to Defendants' Affirmative Defenses states as follows:

1-28. Denied.

29. Plaintiffs deny that Defendant is entitled to reserve the right to name additional affirmative defenses as they become known during the course of discovery because an attempted reservation is in contravention of Federal Court Rules.

Respectfully submitted,

JOHNSON LAW, PLC

By: /s/ Juliana B. Sabatini
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Dated: July 22, 2014

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 22, 2014, I electronically filed the foregoing paper with the Clerk of the Court using the Court ECF system which will send notification of such filing to the following:

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Respectfully submitted,

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